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District of Nevada
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)
Plaintiff,) Case No.: 2:18-cr-0378-APG-VCF
vs.)
CHANNON SOMEE,)
Defendant.)
) STIPULATION TO CONTINUE
) MOTIONS HEARING
) (First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between NICHOLAS A. TRUTANICH, United States Attorney; SUSAN CUSHMAN, Assistant United States Attorney, counsel for the United States of America and SUNETHRA MURALIDHARA, Esq., counsel for defendant SOME:

THAT THE MOTIONS HEARING SCHEDULED FOR December 10, 2019,
be vacated and continued to December 17, 2019 at 1:30 p.m.

1. Counsel for defendant SOMEE and counsel for the government are both unavailable on December 10, 2019

2. Both counsel agree to the continuance.

3. Defendant SOMEE is detained and agrees to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code Section 3161(h)(7)(D) because the defendant has filed pretrial motions which are pending before Court.

6. This is the first request to continue the motions hearing.

DATED this 25th day of November, 2019.

Respectfully submitted,

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Susan Cushman
SUSAN CUSHMAN
Assistant United States Attorney

/s/ Sunethra Muralidhara
SUNETHRA MURALIDHARA, Esq.
Counsel for Defendant SOME

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
Plaintiff,) Case No.: 2:18-cr-0378-APG-VCF
vs.) STIPULATION TO MOTIONS
CHANNON SOMEE,) HEARING
Defendant.) (First Request)

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for defendant SOMEE and counsel for the government are both unavailable on December 10, 2019.
2. Both counsel agree to the continuance.
3. Defendant SOMEE is detained and agrees to the continuance.
4. Based upon continuity of counsel and effective preparation, denial of this request for a continuance would deny the parties herein sufficient time and opportunity to effectively and thoroughly prepare for The motions hearing in this case, taking into account the exercise of due diligence. Denial of this request would result in a miscarriage of justice.
5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act,

Title 18, United States Code Section 3161(h)(1)(D) because the defendant has filed pretrial motions which are pending before this Court.

6. This is the first request to continue the motions hearing.

For all of the above-stated reasons, the end of justice would best be served by a continuance of the hearing date.

ORDER

IT IS ORDERED that the motions hearing currently scheduled for December 10, 2019, be vacated and continued to December 17, 2019, at the hour of 1:30 p.m.

DATED this 2nd day of December, 2019.

Carl Becker

UNITED STATES MAGISTRATE JUDGE

The U.S. Marshal is directed to transport defendant to and from the hearing.